

Complaint Exhibit 22

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
(_____ Division)
Civil Case No. _____

RABO AGRIFINANCE LLC,)	
)	
Plaintiff,)	
)	
v.)	
)	
WESCOR FARM OPERATIONS, LLC)	
f/k/a WESCOR FARMING, LLC;)	AFFIDAVIT OF GLENN KARLBERG
JOSEPH RANDALL ELLER; DD&R)	
LAND HOLDINGS, LLC; D&R LAND)	
HOLDINGS, LLC and ELK CREEK)	
LAND HOLDINGS, LLC,)	
)	
Defendants.)	
)	

I, the undersigned, Glenn Karlberg, being first duly sworn, depose and say as follows:

1. I am over the age of eighteen (18) years, base this affidavit upon my own personal knowledge, and I am competent to testify as to the matters contained herein.

2. I am a citizen and resident of Scottsdale, Arizona.

3. I am a Lead Specialist at Ampleo Turnaround and Restructuring LLC ("Ampleo"). In this capacity, I am familiar with Ampleo's collective history, expertise and experience, as well as its day-to-day operations.

4. Ampleo has vast experience in court appointed receiverships which entail managing and selling agricultural and commercial real estate in insolvency and liquidation contexts and provides a wide range of related business and debt restructuring services in various capacities.

5. Ampleo has the receivership expertise and experience necessary to manage and facilitate the sale of the real and personal property described in Plaintiff's Emergency Motion for Appointment of Receiver filed in conjunction herewith, so as to maximize the related yield/recovery from the property.

6. Additionally, over the past year I have served as chief restructuring officer for Wescor Farming Operations, LLC f/k/a Wescor Farming, LLC ("Wescor") and assisted Wescor and Mr. Eller formulate a plan to orderly liquidate property to satisfy not only Plaintiff's loan but other outstanding indebtedness. Through those efforts, I have become very familiar with the real and personal property described in Plaintiff's Motion, which will be of great benefit and savings to the receivership estate as many of the tracts of land have unique issues and challenges to address and overcome.

7. I certify the following:

a. I/Ampleo am independent as to all parties in interest in the underlying dispute in this action and have no stake or interest in the outcome other than compensation for receiver services;

b. I/Ampleo have not been previously disqualified from serving as receiver;

c. I/Ampleo have never been convicted of a felony or other crime involving moral turpitude;

d. I/Ampleo have never been found liable in a civil court for fraud, breach of fiduciary duty, civil theft, or similar misconduct;

e. I/Ampleo have no interest in the property proposed as receivership property;

f. I/Ampleo have no interest materially adverse to the interests of any party in interest to this action;

g. I/Ampleo have no financial or pecuniary interest, other than receiver compensation, in the outcome of the underlying dispute, including any proposed contingent or success fee compensation arrangement; and

h. I/Ampleo am not a debtor, secured or unsecured creditor, lienor of, or holder of any equity interest in, any party in interest or of receivership property.

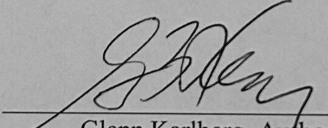
8. Ampleo is willing to serve as the receiver requested pursuant to Plaintiff's Motion for Appointment of Limited Receiver and has agreed to a plan of compensation for its services as follows: Matt McKinlay, Partner, at \$335 per hour; Glenn Karlberg, Lead Specialist, \$295 per hour; other Ampleo analysts and administrative personnel ranging from \$100 to \$250 per hour.

9. I have personal knowledge of the foregoing facts and, based upon that personal knowledge, the foregoing facts are true and correct.

Further affiant sayeth not.

This the ____ day of April, 2025.

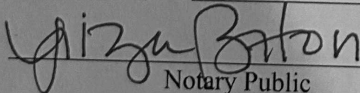
Ampleo Turnaround and Restructuring


Glenn Karlberg, Authorized Representative
CFO Solutions, LLC dba Ampleo
13601 W. McMillian Road #102
PMB 320
Boise, ID 83713

STATE OF OREGON
COUNTY OF MARION

Sworn to and subscribed before me,
by Glenn Karlberg, this

the 24 day of APRIL, 2025.


Notary Public

My Commission Expires: 9/11/2028 (AFFIX SEAL)

3

WBD (US) 4858-4994-5341

